

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 07-113-SLR
	:	
COREY ROANE,	:	
	:	
Defendant.	:	

**DEFENDANT ROANE'S REPLY MOTION  
FOR PRODUCTION OF IMPEACHMENT MATERIAL**

Defendant, Corey Roane, by and through his counsel, Christopher S. Koyste, hereby replies to the Government's Answering Motion in relation to Defendant's Motion for Production of Impeachment Materials.

In support of this reply motion Mr. Roane submits the following:

1. The Government averred in its Answering Motion to Defendant's Motion for Production of Impeachment Materials that it disputes Mr. Roane's factual allegations and legal conclusion that the Defense is entitled to material to impeach the testimony of Wilmington Police Officers who made statements at the December 19, 2007 suppression hearing. However, the Government did not provide any specifics regarding how it disputes the Defense's factual allegations and legal conclusions. Thus, the Defense is unable to effectively respond to the Government's position since they have simply provided a blanket statement of opposition with no explanation of its position. This mirrors the same difficulty that the Defense has in this action in requesting the Government to produce material to impeach the testimony of law enforcement officers who made statements in this action during the suppression hearing.

2. The Defense is in receipt of a letter from AUSA Wolf which provides a very, very brief summary of statements made by the four individuals who took place in a Government organized preparation session days prior to the subject suppression hearing. The Defense telephoned AUSA Wolf to state its position that the letter provides no meaningful summary of impeachment material in relation to this preparation session. Thus, the Defense is left with no alternative than to ask Your Honor to order the Government to produce a summary of inconsistent statements made by the law enforcement officers at this preparation session.

**WHEREFORE**, Mr. Roane requests this Court to order the Government to provide the Defense with a summary of inconsistent statements and/or otherwise impeachment material based upon law enforcement's statements made at the subject preparation session and the suppression hearing.

Respectfully submitted,

/s/ Christopher S. Koyste  
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DATED: February 1, 2008

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**CERTIFICATE OF SERVICE**

Undersigned Counsel certifies that the attached filing of Mr. Roane is available for public viewing and downloading and was electronically delivered on February 1, 2008 to:

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